



U.S. Department of Justice

Civil Division

Washington, D.C. 20530

**BY ECF**

June 20, 2025

Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Scheduling Order: Conference set for 6/24/25 at 2:00pm  
*Haitian Evangelical Clergy Assn., et al. v. Donald J. Trump, in his official capacity as President of the United States of America, et al.*, No. 25-CV-1464 (BMC) (E.D.N.Y.)

Dear Judge Cogan:

On June 5, 2025 and June 12, 2025, Plaintiffs filed status update letters regarding Temporary Protected Status (TPS) for Haiti. ECF Nos. 53, 54. On June 18, 2025, Defendants filed a response letter, stating Defendants' current position. ECF No. 55.

Counsel respectfully requests to reschedule the hearing currently set for June 24, 2025 at 2:00pm in Courtroom 10A South, as both attorneys with primary responsibilities for this matter are unavailable on that date. One is scheduled to appear at previously set hearings and the other is on pre-approved leave. *See National TPS Alliance, et al. v. Noem, et al.*, Case No. 3:25-cv-01766-EMC (N.D. Cal.) (scheduling a hearing for June 24, 2025); *CASA, Inc. v. Noem, et al.*, No. 8:25-cv-01484-TDC (D. Md.) (scheduling a hearing for June 24, 2025).

Defendants request that the hearing be continued to a date the following week or another date convenient to the Court. Defendants apologize for any inconvenience and are prepared to send different counsel to appear at the conference scheduled for June 24, 2025, if that is the Court's preference.

Respectfully submitted,

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By: /s/ Anna L. Dichter  
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cc: All Counsel of Record (by ECF)